

1 THE HONORABLE KYMBERLY K. EVANSON  
2  
3  
4  
5  
6

7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 NORTHWEST ADMINISTRATORS, INC.,

11 Plaintiff,

12 v.

13 DHL EXPRESS (USA), INC., an Ohio  
14 corporation,

15 Defendant.

Case No. 2:25-cv-00921-KKE

**STIPULATION AND ORDER  
EXTENDING DEFENDANT'S  
DEADLINE TO ANSWER OR  
RESPOND TO COMPLAINT**

NOTE ON MOTION CALENDAR:  
June 20, 2025

**STIPULATION**

Defendant DHL Express (USA), Inc. and Plaintiff Northwest Administrators, Inc. hereby STIPULATE AND AGREE to extend the deadline for Defendant to answer or otherwise respond to the Complaint to July 7, 2025.

On June 2, 2025, Plaintiff served the Complaint on Defendant. Under FRCP 12(a)(1), Defendant's answer or other response is currently due on June 23, 2025. Counsel for Plaintiff and Defendant have conferred. In light of the investigation Defendant must undertake to fully assess Plaintiff's complaint, there is good cause to grant the parties' stipulated request for additional time so that the parties and the Court have ample time to address and consider all such issues. Accordingly, Plaintiff and Defendant stipulate and agree, subject to the Court's approval, to extend

STIPULATION AND ORDER EXTENDING  
DEFENDANT'S DEADLINE TO ANSWER OR  
RESPOND TO COMPLAINT - 1  
(Case No. 2:25-cv-00921-KKE)

**MORGAN, LEWIS & BOCKIUS LLP**  
ATTORNEYS AT LAW  
1301 SECOND AVENUE, SUITE 3000  
SEATTLE, WASHINGTON 98101  
TEL +1.206.274.6400 FAX +1.206.274.6401

1 the Defendant's deadline to answer or otherwise respond to July 7, 2025.

2 This stipulation and order shall not operate as an admission of any factual allegation or  
 3 legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim or objection,  
 4 including lack of jurisdiction and the right to seek arbitration of Plaintiff's claims.

5 STIPULATED AND AGREED to this 20th day of June, 2025.

6 **REID, MCCARTHY, BALLEW & LEAHY,  
7 LLP**

8 By: s/Russell J. Reid  
 9 Russell J. Reid, WSBA # 2560  
 10 100 West Harrison Street, N. Tower, #300  
 Seattle, WA 98119  
 Phone: (206) 285-0464  
 Email: [rjr@rmbllaw.com](mailto:rjr@rmbllaw.com)

12 *Attorney for Plaintiff*

6 **MORGAN, LEWIS & BOCKIUS LLP**

7 By: s/Amy P. Taylor  
 8 Amy P. Taylor, WSBA #53644  
 9 1301 Second Avenue, Suite 3000  
 Seattle, WA 98101  
 Phone: (206) 274-6400  
 Email: [amy.taylor@morganlewis.com](mailto:amy.taylor@morganlewis.com)

12 *Attorney for Defendant*

1                   **ORDER**

2 IT IS SO ORDERED.

3

4                   DATED: June 23, 2025.

5

6                   

7

8                   THE HONORABLE KYMBERLY K. EVANSON  
9                   UNITED STATES DISTRICT JUDGE

10                  *Presented by:*

11                  **MORGAN, LEWIS & BOCKIUS LLP**

12                  By: s/ Amy P. Taylor  
13                  Amy P. Taylor, WSBA # 53644  
14                  1301 Second Avenue, Suite 2800  
15                  Seattle, WA 98101  
16                  Phone: (206) 274-6400  
17                  Email: [amy.taylor@morganlewis.com](mailto:amy.taylor@morganlewis.com)

18                  *Attorney for Defendant*

19                  **REID, McCARTHY, BALLEW & LEAHY,  
20                  LLP**

21                  By: s/ Russell J. Reid  
22                  Russell J. Reid, WSBA # 2560  
23                  100 West Harrison Street, N. Tower, #300  
24                  Seattle, WA 98119  
25                  Phone: (206) 285-0464  
26                  Email: [rjr@rmbllaw.com](mailto:rjr@rmbllaw.com)

27                  *Attorney for Plaintiff*